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WASTE MANAGEMENT OF HAWAII, INC.  
92-460 Farrington Highway  
Kapolei, Hawaii 96707  
(808) 668-2985

March 3, 2008

Ms. Kris Poentis, Engineering Section  
State Department of Health  
Environmental Management Division  
Clean Water Branch  
P.O. Box 3378  
Honolulu, HI 96801-3378

**Subject:** Waimanalo Gulch Sanitary Landfill, Kapolei, Oahu, Hawaii  
**File No.** HI R50A533

Dear Ms. Poentis:

Per Hawaii Administrative Rules (HAR) Chapters 11-55, Appendix B, this letter serves as written notification to the State Department of Health (DOH), Clean Water Branch (CWB) of a recent exceedance of storm water discharge limitations as stated in the Waimanalo Gulch Sanitary Landfill (WGSL), Notice of General Permit Coverage (NGPC), dated March 2, 2005. The sample event occurred on February 7, 2008 and Waste Management, Hawaii (WMH) personnel received and reviewed preliminary analytical results on February 25, 2008. Per regulation, a representative of WMH made a verbal notification of these exceedances to the CWB on the same day. The attached preliminary data summary (Attachment A) indicates that three analytes (total suspended solids, total recoverable iron, and total recoverable zinc) were detected in stormwater samples above the discharge limitations listed in the NGPC (total recoverable zinc levels have been confirmed by the laboratory, while total suspended solids and total recoverable iron results are still undergoing data quality review). Also attached for your information, are the following:

- Attachment B – Storm Water Sampling Form
- Attachment C – Field Information Form

The sampled storm event commenced at approximately 1330 on February 7, 2008. Storm water entered the first detention pond from the concrete channel at approximately 1500; the second detention pond began to fill at approximately 1645. Discharge from the outfall was observed beginning at approximately 1845. A composite sample consisting of 4 aliquots collected at 15-minute intervals was collected between 1900 and 2000. The onsite weather station recorded no rainfall the previous 3 days (72 hours) prior to February 7, 2008 and 0.92 inch of rain during the day of that storm event.

Elevated concentrations of iron and zinc have historically been observed in the storm water samples collected upgradient of the landfill and at the discharge point. These results may be indicative of naturally occurring background metals originating from surrounding volcanic soils and basalt.

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Actions that will be implemented by WMH due to the exceedances include the following:

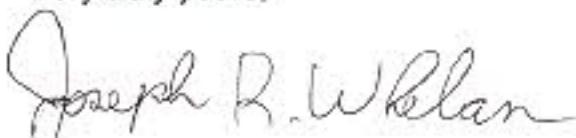
- Assessment of current conditions of the facility's surface drainage system;
- Reevaluation of the current facility surface drainage system;
- Determination of what corrective actions should be implemented.

WMH will follow up with a letter report describing future improvements to the storm water control system.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you should have any questions or require additional information, please contact me at (808) 668-2985.

Very truly yours,



Joseph Whelan  
General Manager/Vice President  
Waste Management of Hawaii

Enclosures: Attachment A – Preliminary Data Summary  
Attachment B – Storm Water Sampling Form  
Attachment C – Field Information Form

cc: Wayne Hamada - City and County of Honolulu  
Jesse Frey – WMH  
Eddie Pettit - WMI  
Michelle Mason - Earth Tech, Project Manager

**Attachment A**  
**Preliminary Data Summary**

**TESTAMERICA LABORATORIES, INC.**  
**PRELIMINARY DATA SUMMARY**

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #:	D8B110153	Waste Management, Inc. 995 WAIMANALO GULCH LF Project Number: SITE 995/HI02	PAGE 1
		Date Reported:	2/22/08
PARAMETER	RESULT	REPORTING LIMIT	ANALYTICAL UNITS METHOD
Client Sample ID: WGSL-DB01E			
Sample #: 001	Date Sampled: 02/07/08 19:00	Date Received: 02/11/08	Matrix: WATER
Inductively Coupled Plasma (ICP) Metals			Reviewed
Iron	53000	100	ug/L MCAWW 200.7
Zinc	99	20	ug/L MCAWW 200.7
Base/Neutrals and Acids			Reviewed
Alpha-Terpineol	ND	10	ug/L CFR136A 625
Benzoic acid	ND	50	ug/L CFR136A 625
Phenol	ND	10	ug/L CFR136A 625
4-Methylphenol	ND	10	ug/L CFR136A 625
Inorganic Analysis			Reviewed
Chemical Oxygen Demand	54	20	mg/L MCAWW 410.4
N-Hexane Extractable Material (1664A)	4.8 B	5.0	mg/L CFR136A 1664A HRM
Nitrogen, Ammonia	0.12	0.10	mg/L MCAWW 350.1
Nitrate-Nitrite	2.7	0.10	mg/L MCAWW 353.2
Total Kjeldahl Nitrogen	IN PROCESS	0.50	mg/L MCAWW 351.2
Total phosphorus	0.25	0.050	mg/L MCAWW 365.3
Non-Filterable Residue (TSS)	620 Q	8.0	mg/L MCAWW 160.2

B Estimated result. Result is less than RL.

Q Elevated reporting limit. The reporting limit is elevated due to high analyte levels.

**Attachment B**  
**Storm Water Sampling Form**

**Storm Water Sampling Form**  
**Waimanalo Gulch Sanitary Landfill**  
**Storm Water Pollution Control Plan**

Sampling Location: W GSL		Date: 2/7/08		
		Project Number:		
Sampling Personnel: JHL, PRL				
Weather Conditions: Rain, Temp 75°				
Observations/Comments				
Instrument	Manufacturer	Model	Serial No.	Calibration Date and Time
pH Meter	Ultrameter Myron L Co.	Ultrameter II		1/5/08 - 1/7/08
Comments: Time at Start of Rain: 1330      Time of First Runoff: 1845 Sample Collection Method: 4 aliquot composite at 15 minute intervals Flow-Measurement Method: ruler in outfall - engineering design formula Describe: approx 0.3 ft <sup>3</sup> /sec discharge according to chart in SWPMP page B-10				
SAMPLE NUMBER	TIME SAMPLED	pH	FLOW MEASUREMENTS	
W GSL-DB01	1900	8.34	2 1/4 in → ~ 0.3 ft <sup>3</sup> /sec	
				
Comments: Rain started apx 1330, water began running down concrete channel apx 1500, into first detention pond, no discharge observed. At apx 1645 water began to spill over from first detention pond into second; no discharge at outfall. At apx 1845, water began to discharge, started collecting sample @ apx 1900				

**Attachment C**  
**Field Information Form**

# FIELD INFORMATION FORM

Site Name: W GSLSite No.:    Sample Point:        
W GSL - DB01E

This Waste Management Field Information Form is Required.  
This form is to be completed, in addition to any State Forms. The Field Form is submitted along with the Chain of Custody Forms that accompany the sample containers (i.e., with the cooler that is returned to the laboratory).



Laboratory Use Only/Job ID:

PURGE INFO		<u>b20708</u>									
PURGE DATE (MM DD YY)		PURGE TIME (24 Hr Clock)		ELAPSED HRS (Decimal)		WATER VOL IN CASING (Gallons)		ACTUAL VOL PURGED (Gallons)		WELL VOLs PURGED	
<i>Note: For Positive Sampling, replace "Water Vol in Casing" and "Well Vol Purged" in Water Vol in Casing/Filer Cell and Taking/Filer Cell Vol Purged. Make changes record field date, below.</i>											
PURGE SAMPLE EQUIPMENT		Purging and Sampling Equipment ... Dedicated: <input checked="" type="checkbox"/> Y or <input type="checkbox"/> N		Filter Device: <input checked="" type="checkbox"/> Y or <input type="checkbox"/> N <input type="checkbox"/> 0.45 $\mu$ or <input type="checkbox"/> 0.45 $\mu$ (circle one if 1st)							
Purging Device: <u>  </u>		A- Submersible Pump      D-Boiler				A-In-line Disposable      C-Vacuum					
Sampling Device: <u>  </u>		B-Peristaltic Pump      E-Piston Pump				B-Pressure      X-Other					
X-Other: <u>  </u>		C-QED Bladder Pump      F-Dripper/Bottle				A-Teflon      C-PVC      X-Other					
						Sample Tube Type: <u>  </u>		B-Stainless Steel      D-Polypropylene			
WELL DATA		Well Elevation (at TOC) <u>  </u> (ft)		Depth to Water (DTW) (from TOC) <u>  </u> (ft)		Groundwater Elevation (site datum, from TOC) <u>  </u> (ft)					
Total Well Depth (from TOC) <u>  </u> (ft)		Stick Up (from ground elevation) <u>  </u> (ft)				Casing ID <u>  </u> (in)		Casing Material <u>  </u>			
<i>Note: Total Well Depth, Stick Up, Casing Id, etc. are optional and can be from historical data, which required by State Permit. Well Elevation, DTW, and Groundwater Elevation must be current.</i>											
STABILIZATION DATA (Optional)	Sample Time (2400 Hr Clock)	Rate/Unit	pH (std)	Conductance (SC/EC) ( $\mu$ mhos/cm @ 25 °C)	Temp. (°C)	Turbidity (ntu)	D.O. (mg/L - ppm)	eH/ORP (mV)	DTW (ft)		
	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>			
	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>			
	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>			
	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>			
	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>			
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	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>			
	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>			
	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>			
Suggested range for 3 consec. readings or rate Permits/Spec requirements:		<u>&lt;0.2</u>	<u>+/- 3%</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>+/- 10%</u>	<u>+/- 20 mV</u>	<u>Stable</u>		
<i>Stabilization Data Fields are Optional (i.e., complete stabilization readings for parameters required by WM, Site, or State). These fields can be used where four (4) field measurements are required by State Permit/Site. If a Data Logger or other Electronic format is used, fill in final readings below and submit electronic data separately to Site. If fewer fields above are needed, use separate sheet or form.</i>											
FIELD DATA	SAMPLE DATE (MM DD YY)	pH (std)	CONDUCTANCE ( $\mu$ mhos/cm @ 25 °C)	TEMP. (°C)	TURBIDITY (ntu)	DO (mg/L - ppm)	eH/ORP (mV)	Other: Units			
	<u>b20708</u>	<u>8/24/04</u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>			
<i>Final Field Readings are required (i.e. record field measurements, final stabilized readings, passive sample readings before sampling for all field parameters required by State Permit/Site).</i>											
FIELD COMMENTS	Sample Appearance: <u>Cloudy</u>	Odor: <u>None</u>	Color: <u>Light reddish-brown</u>	Other: <u>  </u>							
	Weather Conditions (required daily, or as conditions change):	Direction/Speed: <u>NE 15 mph</u>	Outlook: <u>  </u>	Precipitation: <input checked="" type="checkbox"/> Y or <input type="checkbox"/> N							
Specific Comments (including purge/well volume calculations if required):											
<u>Discharge from outfall was observed at appx 1845</u>											
<u>Collected composite sample W GSL - DB01E at 1900</u>											
<u>- 4 alternate samples at 15 min intervals</u>											
_____ _____ _____											
I certify that sampling procedures were in accordance with applicable EPA, State, and WM protocols (if more than one sampler, all should sign):											
<u>02/08/04</u>	<u>Date in Place</u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>
Date: _____	Name: _____	Signature: _____		Company: _____							
DISTRIBUTION: WHITE/ORIGINAL - Stays with Sample, YELLOW - Returned to Client, PINK - Field Copy											
STL-8029/WM: R: 1200											